



**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH**

**OFFICE of SHELLFISH and WATER PROTECTION**

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February 3, 2012

Gerry O'Keefe  
Executive Director  
Puget Sound Partnership  
326 East D Street  
Tacoma, Washington 98421

Dear Mr. O'Keefe:

Thank you for the opportunity for the Washington State Department of Health (DOH) to review the draft Puget Sound Action Agenda and provide comments.

DOH appreciates all of the hard work that you and your staff put into developing this important document. It was a priority for us to be involved in updating this document and we hope our comments provide more clarity in the areas that impact us. We are fully committed to implementing the final Action Agenda, w

In the attached tables, we compiled comments from the Offices of Shellfish and Water Protection and Environmental Health, Safety and Toxicology. Most of our comments are focused on the wastewater, shellfish, and cumulative pollution impacts sections. While all of these comments are important, comments that we believe are most important have been marked as a priority. Some of our priority comments, significant revisions, and additions include:

- Our concern about the ecosystem recovery target titled Management of On-Site Sewage (OSS) Systems. We believe the first part of the target is challenging enough (95% current with inspections) and that the second part (90% coverage of unsewered marine shorelines) is unrealistic. Focusing on this second part of the target will detract us from our focused efforts to find and fix failing systems in priority areas to designate additional areas for this work. We currently are at about 30% current with inspections. With limited resources in local health jurisdictions and in my program, our priority for the next 8 years should be to focus on getting from 30% to 95% current with inspections. This is the right focus to help us achieve another important recovery target of upgrading 10,800 harvestable shellfish acres.
- We reinstated a near term action for a legislative action for sustainable local funding for OSS management programs and added a near term action on sustainable regional funding for OSS management programs.

- There are over 100 municipal and industrial wastewater treatment plants discharging a combined daily flow of 430 million gallons per day of treated effluent throughout Puget Sound. We find it odd that there is only one near term action (NTA) for centralized wastewater and suggest that the Partnership work with Ecology to build on this strategy. One opportunity would be to add planned priority upgrades as NTAs. We added a sub-strategy and NTA for the development of a coordinated outfall strategy to reduce impacts to shorelines and shellfish growing areas.
- We provided current information and revised language for the shellfish section narrative to improve accuracy and clarity.
- We revised the NTAs for shellfish protection districts and other approaches for working with local communities to correct pollution problems and restore shellfish growing areas.
- We included a near term action for the Shellfish Initiative Pollution Control Action Team, although Ecology is the lead for this action, we encourage you to seek their input as well.
- We consolidated shellfish research into one section and provided suggested language for the section.

Please call me if you have any questions about our comments. I would be happy to discuss them with you. I can be reached at (360) 236-3391.

Sincerely,



Jerrod Davis, P.E.  
Director

cc: Maryanne Guichard, Department of Health  
Mary Knackstedt, Department of Health

Attachment